

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re

FTX TRADING LTD., *et al.*¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Re: Docket No. 1192

**CERTIFICATION OF COUNSEL REGARDING ORDER DENYING
MOTION OF THE JOINT PROVISIONAL LIQUIDATORS FOR A DETERMINATION
THAT THE U.S. DEBTORS' AUTOMATIC STAY DOES NOT APPLY TO, OR IN THE
ALTERNATIVE FOR RELIEF FROM STAY FOR FILING OF THE APPLICATION IN
THE SUPREME COURT OF THE COMMONWEALTH OF THE BAHAMAS
SEEKING RESOLUTION OF NON-US LAW AND OTHER ISSUES**

The undersigned hereby certifies as follows:

1. On March 29, 2023, Brian C. Simms KC, Kevin G. Cambridge, and Peter Greaves (the “**JPLs**”), in their capacity as the duly appointed joint provisional liquidators of FTX Digital Markets Ltd., filed the *Motion of the Joint Provisional Liquidators for a Determination that the U.S. Debtors' Automatic Stay does not Apply to, or in the Alternative for Relief from Stay for Filing of the Application in the Supreme Court of the Commonwealth of The Bahamas Seeking Resolution of Non-US Law and Other Issues* [D.I. 1192] (the “**Motion**”), with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).²

¹ The last four digits of FTX Trading Ltd.’s tax identification number are 3288. Due to the large number of debtor entities in the chapter 11 cases, a complete list of the debtors (the “**Chapter 11 Debtors**”) and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Chapter 11 Debtors’ proposed claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Multiple parties, including the debtors in possession in the above-captioned cases (collectively, the “**Debtors**”), filed objections and other responses to the Motion and the relief requested therein (together, the “**Objections**”). *See* Docket Nos. 1408, 1409, 1412, 1472, 1480.

3. On June 8 and 9, 2023, the Court held a hearing to consider, among other things, the relief requested in the Motion, as well as the Objections and all other replies and related documents filed in response thereto (the “**Hearing**”). For the reasons stated on the record at the Hearing, the Court denied the relief requested in the Motion.

4. Consistent with the statements made on the record at the Hearing, the JPLs have prepared a proposed form of order denying the Motion, a copy of which is attached hereto as **Exhibit A** (the “**Proposed Order**”). The Proposed Order has been circulated to the FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the “**Chapter 11 Debtors**”), and the Chapter 11 Debtors do not object to entry of the Proposed Order.

WHEREFORE, the JPLs respectfully request that the Court enter the Proposed Order, substantially in the form attached hereto as **Exhibit A** at its earliest convenience.

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Dated: July 14, 2023
Wilmington, Delaware

/s/ Brendan J. Schlauch
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